

**EXHIBITS**  
**STATEMENT OF FACTS IN OPPOSITION**  
**TO MOTION FOR SUMMARY JUDGMENT**

- A. Excerpts from Interrogatory Answers by Víctor Cruz-Sánchez
- B. Excerpts from Interrogatory Answers by Juan Colón-Báez
- C. Excerpts from Interrogatory Answers by Rafael Figueroa-Solís
- D. Excerpts from Interrogatory Answers by Edwin Rivera-Merced
- E. Excerpts from Admissions by Pedro Toledo-Dávila
- F. Excerpts from Deposition of Luis Rodríguez-González
- G. Service List for Impact Service, August 6-12, 2007
- H. Excerpts from Deposition of Edwin Rivera-Merced
- I. Excerpt from Impact Service Plan, August 6, 2007
- J. Excerpts from Deposition of Juan Colón Báez
- K. Excerpts from Deposition of Víctor Cruz-Sánchez
- L. Excerpts from Deposition of Pedro Toledo-Dávila
- M. Excerpts from Deposition of Fermín Torres-López
- N. Excerpts from Deposition of Ricardo Lebrón-Rivera
- O. Report by Luis Rodríguez-González to Edwin Rivera-Merced, August 13, 2007
- P. Report by Víctor Cruz-Sánchez to Edwin Rivera-Merced, August 11, 2007
- Q. Report by Homicide Agent José Rivera-Rodríguez, August 13, 2007
- R. Press Release by Agent Edgardo Viera, August 11, 2007
- S. Report by Víctor Cruz-Sánchez (“Ampliación”)
- T. El Nuevo Día News Article, August 13, 2007

U. Excerpts from Interrogatories directed at Pedro Toledo-Dávila

V. Excerpts from Answers to Interrogatories by Pedro Toledo-Dávila

W. Excerpts from Deposition of Carlos Díaz

X. Video CD

Y. Excerpts from Report of Carlos Díaz

Z. Personal History, Javier Pagán-Cruz, dated November 7, 2008

AA. Memorandum by Sgt. Rufino Carrión, dated September 29, 1998

BB. Memorandum by Lieut. Rafael Rivera-Carrasquillo date October 1, 1998

CC. Resolution of Charges by Superintendent Agustín Cartagena, August 30, 2004

DD. Excerpts from Domestic Violence Complaint file, August 23, 2000

EE. Memorandum by Lieut. Arcadio Amaro, November 17, 1998

FF. Memorandum by Lieut Vilma Fernández, December 17, 1998

GG. Memorandum assigning Javier Pagán to Humacao Tactical Operations, November 4, 2004

HH. Excerpts from Deposition of Rafael Figueroa-Solís

II. Excerpts from Deposition of Vilma Fernández

JJ. Personal History, Javier Pagán-Cruz, dated September 8, 2003

KK. Arrest Order dated April 19, 2002

LL. Sixty-Day Suspension letter by Pedro Toledo, May 18, 2006

MM. Memorandum from Human Resources regarding Sixty-Day Suspension, August 28, 2006

NN. Excerpts from General Order 87-14

OO. Special Order 90-5

PP. Excerpts from from Deposition of Edwin Rivera-Merced Santiago v. ELA, HSCI2008-00926

- QQ. Excerpts from evaluations of Javier Pagán by Rafael Figueroa-Solís
- RR. List of attendance at Academies in Humacao Tactical Operations
- SS. Certification by Rafael Figueroa-Solís, August 14, 2007
- TT. Notification by Edwin Rivera-Merced re Suspension of Javier Pagán-Cruz, August 24, 2006
- UU. Evaluation of Javier Pagán by Víctor Cruz-Sánchez, January 2, 2007
- VV. Memo from Víctor Cruz-Sánchez to Human Resources re reincorporation to service of Javier Pagán Cruz, October 22, 2006
- WW. Excerpts from Interrogatories to Edwin Rivera-Merced
- XX. Rule 30(b)(6) Subpoena
- YY. Addendum to Rule 30(b)(6) Subpoena
- ZZ. Excerpts from Rule 30(b)(6) Deposition (Luis De-Jesús and Francisco Morfi-Marrero)
- AAA. Excerpts from Edwin Rivera-Merced's Answers to Requests for Admissions
- BBB. Excerpts from deposition of Javier Pagán-Cruz in the case of Santiago v. Morales de León, Civil No. 08-1828
- CCC. Excerpts from Deposition of Carlos Sustache in the case of Santiago v. Morales de León, Civil No. 08-1828, ("CS Depo"), page 38, line 10, page 55, line 24-25
- DDD. Excerpts from NIE Investigation of the Death of Nelson Santiago
- EEE. Excerpts from Deposition of Abdel Morales in Santiago Reyes v. Morales de León, Civil No. 08-1828
- FFF. Excerpts from Deposition of Héctor Cintrón
- GGG. SAIP-DIP-AC-4-1,376, Edwin Rivera-Merced Personal History ("Historial")
- HHH. August 14, 2007 Charge Resolution
- III. Service List for Tactical Operations, August 6 to 12, 2007

JJJ. Lou Reiter Report

KKK. Excerpts from Deposition of Jackeline Aponte

LLL. Excerpts from Deposition of Lou Reiter

MMM. SAIP-OIP-AH-1-792, Memo from Capt. Héctor Cintrón to Col. Aníbal Ortiz, August 14, 2007

NNN. Excerpts from Deposition of Evelyn Ramírez-Lliveras